

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>:</b>	<b>CHAPTER 13</b>
<b>JENNIFER KELLEY BRINK</b>	<b>:</b>	
<b>fka Jennifer K Morrison; dba General</b>	<b>:</b>	<b>CASE NO. 1:15-bk-03887</b>
<b>Fitness</b>	<b>:</b>	
<b>Debtor</b>	<b>:</b>	
	<b>:</b>	
<b>BANK OF AMERICA NA,</b>	<b>:</b>	
<b>Movant</b>	<b>:</b>	
	<b>:</b>	
<b>v.</b>	<b>:</b>	
	<b>:</b>	
<b>JENNIFER KELLEY BRINK</b>	<b>:</b>	
<b>fka Jennifer K Morrison; dba General</b>	<b>:</b>	
<b>Fitness,</b>	<b>:</b>	
<b>Respondent</b>	<b>:</b>	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's review of payments made.
7. Proof of amount owed is demanded at trial and this paragraph is therefore denied pending Debtor's review of payments made.
8. Denied that Movant has demonstrated cause for relief.

9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

---

Dorothy L. Mott, Esquire  
Mott & Gendron Law  
Attorney ID # 43568  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
doriemott@aol.com